Message

From: Kesler, Karen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=32B2F61B5024435ABE86A61325F241D9-KESLER, KAR]
Sent: 9/16/2019 12:57:22 PM
To: Barash, Shari [Barash.Shari@epa.gov]; Anderson, Danielle [Anderson.Danielle@epa.gov]
CC: Fleisig, Erica [fleisig.erica@epa.gov]; Sengco, Mario [Sengco.Mario@epa.gov]
Subject: Comments on California PBA for the Koocaunsa Selenium Technical Subcommittee

Hi Shari and Danielle,

Today I will be speaking briefly at the Koocanusa Selenium Technical Subcommittee meeting about the California PBA. This is will just be a brief introduction to the document and then Karen Jenni of USGS will be doing a more in-depth presentation on the mechanistic model and the framework for the model for Lake Koocanusa. I will likely be giving a more in-depth presentation about the PBA in October for the group. This is all in an effort to educate some of the new members on the technical subcommittee about the selenium criterion development process.

I've generated some bullets that I will be using to guide my comments and just wanted to run them past you, to see if you had any concerns with them. Since the purpose is really just to talk about the method, I didn't get into the specifics of what a PBA is. Let me know if you think I should do that.

- Comments to introduce California PBA
  - The purpose of this document was to lay out specific methodologies that the state would follow to develop a site specific water column criterion element, following either the mechanistic model approach or the BAF approach
  - This is one example of methods that can be used to generate a site specific water column criterion element for selenium
  - As EPA is promulgating the selenium criterion in CA, this document was generated by EPA, but written from the perspective of the state, since it will be the state that will follow the methods described
  - This document is currently draft and may be revised based on comments received during the public comment period
  - In this document, because it needs to be a transparent, repeatable method, it lays out the exact methods that the state would follow including decision points such sample sizes and data analysis procedures
  - The general steps of the method are first defining your site and determining what aquatic community is present
    - Then, based on highest bioaccumulation potential, a target species to be used for the translation will be selected
    - Then a translation approach will be selected, either the mechanistic model (which Karen will be presenting on) or the BAF approach
    - With the mechanistic model, we propose collecting site specific particulate samples and water samples to generate site specific EFs and then using information from the literature to generate appropriate TTFs and CFs
    - With the BAF approach, we propose collecting site specific fish tissue or bird eggs (since CA also has a wildlife criterion) and site specific water samples to generate a BAF
    - We then also include the steps that will be followed to analyze this data and generate a final water column criterion element

Thanks,
Karen

Karen Kesler, PhD
Office of Science and Technology
U.S. Environmental Protection Agency

Washington, DC
202-564-4612